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April 28, 2015

**VIA U.S. MAIL & FACSIMILE**

Regional Freedom of Information Officer  
U.S. EPA, Region 9  
San Francisco, CA 94105  
Fax: (415) 947-3591

National Freedom of Information Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460

Re: **Freedom of Information Act Request**  
***Robert Swanson v. A.O. Smith Water Products Company, et al.***  
Los Angeles County Superior Court Case No. BC571451 (JCCP4674)  
Our Client: Reynolds Metals Company

To Whom It May Concern:

We are requesting disclosure of the following records pursuant to the Freedom of Information Act (5 USCS § 552), within the next twenty business days. All requested records pertain to the following locations between 1981-2005:

- **Reynolds Metals Company, 401 Madrid Ave, Torrance, CA 90501; and**
- **Reynolds Metals Company, 500 Crenshaw Blvd., Torrance, CA 90509 (collectively, "the Premises").**

(1) Any records or documents<sup>1</sup> pertaining to the construction, maintenance, rebuilding, repairs/remodeling work and/or abatement work performed on the Premises, which in any way involved asbestos.

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<sup>1</sup> The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations,

(2) Any records or documents identifying any and all persons, contractors, or other entities who performed construction, maintenance, rebuilding, repair/remodeling, and/or abatement work on the Premises, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos clean-up or abatement work and any industrial/chemical clean-up or abatement work performed on the Premises.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling that measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed on the Premises.

(5) Any records, documents, or letters from the EPA pertaining to warnings, citations, or violations at the Premises, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the EPA, which addressed the issue of health hazards created by or associated with exposure to asbestos.

(7) Any written communication from or to the EPA regarding the Premises, which in any way involved asbestos.

FOIA allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide the remainder of the documents. Further, if you withhold any documents, please justify the withholding by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. We reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the records requested. If there is a charge for this information, please inform me if the charge exceeds \$50.00.

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violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in your possession, custody, or control or known or believed by you to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

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Thackston & Young LLP  
April 28, 2015  
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If you have any questions, please feel free to contact Raymond Kim at (213) 486-8046 or by e-mail at [rkim@hptylaw.com](mailto:rkim@hptylaw.com).

Sincerely,

**HAWKINS PARNELL  
THACKSTON & YOUNG LLP**

  
Raymond Kim